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7 **UNITED STATES DISTRICT COURT**
8 **WESTERN DISTRICT OF WASHINGTON**
9 **AT SEATTLE**

10 STATE OF WASHINGTON, et al.,

11 NO.

12 Plaintiffs,

13 DECLARATION OF
14 REBEKAH GARDEA

v.

15 DONALD J. TRUMP, in his official
16 capacity as President of the United States of
17 America, et al.,

18 Defendants.

1 I, Rebekah Gardea, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
 3 this declaration based on my personal knowledge.

4 2. I am the Community Advocacy and Outreach Director for the QLaw Foundation
 5 of Washington. I've served in this role for two and a half years. I have a Master's degree in
 6 education and previously worked in public education.

7 3. In my position, I engage in advocacy work, including legislative advocacy, and
 8 provide avenues for community voices to be heard. I support community members testifying for
 9 legislation. I talk to lawmakers and organize coalitions of community groups. I also connect with
 10 community serving organizations for communities across the state, especially in eastern
 11 Washington.

12 4. The QLaw Foundation of Washington is a civil legal aid organization. Our
 13 mission is to promote the dignity and respect of Two-Spirit, Lesbian, Gay, Bisexual,
 14 Transgender, Queer, Intersex, Asexual, and more (2SLGBTQIA+) Washingtonians within the
 15 legal system through advocacy, education, and legal assistance. Our vision is a world in which
 16 no 2SLGBTQIA+ person will face additional barriers to authentic living, access to justice, or
 17 equality before the law because of their queer identity.

18 5. We provide free legal aid to the 2SLGBTQIA+ community and serve
 19 approximately 300 people annually. This legal aid includes free consultations by legal clinic
 20 appointment, direct representation, and impact litigation. While youth are not our primary
 21 service population, we've seen a number of youth in our clinics who have come with their parents
 22 or without. In 2024, youth were approximately 10 percent of the community members we served.

23 6. I understand that the President of the United States has issued an Executive Order
 24 restricting access to gender-affirming care for trans youth. This Executive Order will impact our
 25 organization and the community we serve in a number of ways. First, QLaw Foundation has
 26 represented individuals who have been denied gender-affirming care, even if it is medically

recommended by doctors, therapists, and approved by parents. We already see community members who are denied health insurance coverage for gender-affirming care, and we anticipate that this will increase, even against explicit consent by parents and medical providers. This will lead more individuals to reach out to us for legal assistance to access the care they need.

7. Second, we anticipate that fewer providers will provide gender-affirming care. This will disproportionately affect rural communities, where there are already fewer providers who provide gender-affirming care. This will make it more difficult to provide referrals to individuals seeking gender-affirming care and will put a strain on those providers who are available as the demand for their services grows.

8. Third, this order will have a chilling effect on our community, schools, and families. This will lead to more hostile school environments, and schools won't have clear guidelines about how to provide care. We've already seen school staff retaliated against for upholding student rights, and we think this will get worse.

9. There is a misconception that gender-affirming care is always hormone therapy. But for many trans youth, gender-affirming care is mental health services and community support. Because of how broad the Executive Order is, we are concerned that youth will not be able to access vitally important mental health services. This means other needs, including assessments for learning disabilities or neurodivergence, won't be met.

I declare under penalty of perjury under the laws of the State of Washington and the United States of America that the foregoing is true and correct.

DATED this ____ day of February 2025 at _____, Washington.

REBEKAH GARDEA
Community Advocacy and Outreach Director
QLaw Foundation of Washington

1 recommended by doctors, therapists, and approved by parents. We already see community
 2 members who are denied health insurance coverage for gender-affirming care, and we anticipate
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14 9. There is a misconception that gender-affirming care is always hormone therapy.
 15 But for many trans youth, gender-affirming care is mental health services and community
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 17 able to access vitally important mental health services. This means other needs, including
 18 assessments for learning disabilities or neurodivergence, won't be met.

19 I declare under penalty of perjury under the laws of the State of Washington and the
 20 United States of America that the foregoing is true and correct.

21 DATED this 4 day of February 2025 at Seattle, Washington.



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 23 REBEKAH GARDEA
 24 Community Advocacy and Outreach Director
 25 QLaw Foundation of Washington
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